

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 811

**CERTIFICATION OF COUNSEL REGARDING MOTION OF DEBTORS FOR ENTRY
OF AN ORDER (I) CONDITIONALLY APPROVING THE ADEQUACY OF THE
DISCLOSURE STATEMENT, (II) SCHEDULING A PLAN CONFIRMATION AND
FINAL DISCLOSURE STATEMENT APPROVAL HEARING AND SETTING DATES
AND DEADLINES, (III) APPROVING THE SOLICITATION PACKAGE AND NOTICE
PROCEDURES, (IV) APPROVING THE FORM OF BALLOT AND NOTICES IN
CONNECTION THEREWITH, AND (V) GRANTING RELATED RELIEF**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On May 5, 2025, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Scheduling a Plan Confirmation and Final Disclosure Statement Approval Hearing and Setting Dates and Deadlines, (III) Approving the Solicitation Package and Notice Procedures, (IV) Approving the Form of Ballot and Notices in Connection Therewith, and (V) Granting Related Relief* [Docket No. 811] (the “Solicitation Procedures Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). The Solicitation Procedures Motion attached a proposed form of order as

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Exhibit A granting the relief requested in the Solicitation Procedures Motion (the “Original Proposed Order”).

2. Pursuant to the notice of the Solicitation Procedures Motion, the deadline to file an objection to the Solicitation Procedures Motion was May 21, 2025 at 4:00 p.m. (the “Objection Deadline”).

3. Prior to the Objection Deadline, the Debtors received informal comments to the Original Proposed Order from the Office of the United States Trustee (the “U.S. Trustee”).

4. To resolve the U.S. Trustee’s informal comments, the Debtors and the U.S. Trustee agreed to certain changes to the Original Proposed Order. Attached hereto as **Exhibit A** is a revised proposed form of order (the “Revised Proposed Order”).

5. For the convenience of the Court and parties in interest, attached hereto as **Exhibit B** is a blackline comparing the Revised Proposed Order against the Original Proposed Order filed with the Solicitation Procedures Motion.

6. The Debtors respectfully request that the Court enter the Revised Proposed Order, attached hereto as **Exhibit A**, at its earliest convenience.

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Dated: May 24, 2025
Wilmington, Delaware

/s/ Stacy L. Newman

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